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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AMIT FATNANI and SRINIVAS

GURUZU,
individually, and on behalf of
all others similarly situated

Case No. 3:23-cv-00712

**JOINT PROPOSED CASE
MANAGEMENT PLAN**

Plaintiffs,

vs.

**JPMORGAN CHASE & CO., KEYBANK
NATIONAL ASSOCIATION;
COLUMBIA BANKING SYSTEMS, INC.
AS SUCCESSOR TO UMPQUA
HOLDINGS CORPORATION; EVOLVE
BANK AND TRUST; AND MERCURY
TECHNOLOGIES INC,**

Defendants.

Plaintiffs Amit Fatnani and Srinivas Guruzu, individually and on behalf of all others similarly situated (hereafter, “Plaintiffs”), and Defendants Columbia Banking Systems, Inc. as Successor to Umpqua Holdings Corporation (“Columbia”); KeyBank National Association

(“KeyBank”); and JPMorgan Chase Bank, N.A.¹ (“Chase”) hereby submit this Joint Proposed Case Management Plan in accordance with the Court’s Order dated May 6, 2025 (D.E. 165).

Plaintiffs have agreed to settle all claims against Columbia, KeyBank, and Intertrust Corporate and Fund Services, LLC (collectively, the “Settling Defendants”). Deadlines pertaining to the Court’s consideration of that proposed settlement are included in the Case Management Plan below.

Event	Proposed Deadline
Plaintiff’s deadline to file amended complaint	On or before May 30, 2025
Settling Defendants’ deadline to respond to amended complaint	Deadline extended without date, and only due in the event the Court denies approval of the parties’ proposed settlement. In that instance, responses would be due 30 days after the Court’s final order denying approval.
Deadline for Chase to respond to amended complaint	June 13, 2025
Deadline to file motion for preliminary approval of settlement with Settling Defendants	On or before June 13, 2025
Final approval briefing, final fairness hearing, and related deadlines	To be fixed by the Court following preliminary approval of the proposed settlement
Close of fact discovery	January 29, 2026
Initial expert disclosures and report deadline	February 10, 2026
Deadline to file motion for class certification (as to claims against Chase only)	February 17, 2026 ²
Rebuttal expert disclosures and report deadline	March 13, 2026
Expert discovery cutoff (includes filing of any discovery motions)	April 17, 2026

¹ JPMorgan Chase Bank, N.A. is the correct entity name for this party defendant. (D.E. 141 n. 1.)

² During the May 6, 2025 Final Fairness Hearing considering Plaintiffs’ proposed settlement with certain other Defendants, counsel for Plaintiffs indicated that he believed Plaintiffs could have a class certification motion as to the claims against Chase filed within approximately 60 days. Thereafter, during the conferral process regarding the preparation of this proposed Case Management Plan, counsel for Chase indicated their desire to take discovery potentially informing their opposition to Plaintiffs’ forthcoming certification motion. On that basis, the parties are proposing a later date for the filing of their initial motion for certification than Plaintiffs’ counsel previously indicated.

Deadline to oppose motion for class certification	May 1, 2026
Deadline to file motions for summary judgment	July 1, 2026

Plaintiffs and Chase propose that the Court provide potential trial dates in the first quarter of 2027. The parties anticipate that trial will last 5-7 days. The parties further propose that the Court schedule a status conference to be conducted after any motions for summary judgment are decided and during which any and all remaining pretrial deadlines will be fixed.

RESPECTFULLY SUBMITTED AND DATED this 20th day of May 2025

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